



Amy L. Alvarez
Associate Director-
Federal Regulatory

AT&T Services, Inc.
1401 I. Street, NW
Suite 1100
Washington, DC 20005

T: 202.326.8884
F: 281.664.9610

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VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

RE: IP-Enabled Services, WC Docket 04-36
E911 Requirements for IP-Enabled Service Providers, WC Docket 05-196

Dear Ms. Dortch:

On January 30, 2006, David Barlow (via conference call), Thomas Hughes, Jack Zinman and I, of AT&T, met with Kirk Burgee, Renee Crittendon, Marcus Maher and Christi Shewman of the Wireline Competition Bureau. The purpose of this meeting was to discuss the technical limitations and challenges associated with the provision of E911 services in the TDM and IP PBX environments. The attached presentation was distributed during the meeting and served as the basis of our discussion.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Amy L. Alvarez". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Attachment

CC: Kirk Burgee
Renee Crittendon
Marcus Maher
Christi Shewman

E911 Service Provision for MultiLine Telephone Systems (MLTS) such as TDM PBXs and IP PBXs

Current Processes and Limitations

IP-Enabled Services

WC Docket No. 04-36

E911 Requirements for IP-Enabled Service Providers

WC Docket No. 05-196



HOW DOES E911 SERVICE WORK FOR PBXs WITH TRADITIONAL WIRELINE LOCAL EXCHANGE SERVICE?

Today's PBXs can have remote and nomadic users

- Both TDM PBXs and IP PBXs can support remote and nomadic users, by allowing users to access the PBX via a corporate Intranet
- The LEC will not know which users are remote or nomadic – PBX owner manages number assignments for its end users.
- Today, any E911 calls from a remote or nomadic PBX user are processed by the PBX and LEC network as if originated at the main corporate location.
- The E911 Scope Order does not impose any special obligations in this situation

VoIP PBX SERVICE PROVIDER FACES SAME E911 TECHNICAL LIMITATIONS AS TDM PBX SERVICE PROVIDER

Business VoIP services can connect directly to an IP PBX or via a gateway to a TDM PBX, providing the same capabilities as ISDN PRIs as well as added VoIP features.

The PBX owner chooses the information sent to PSAP; use of VoIP service does not change this.

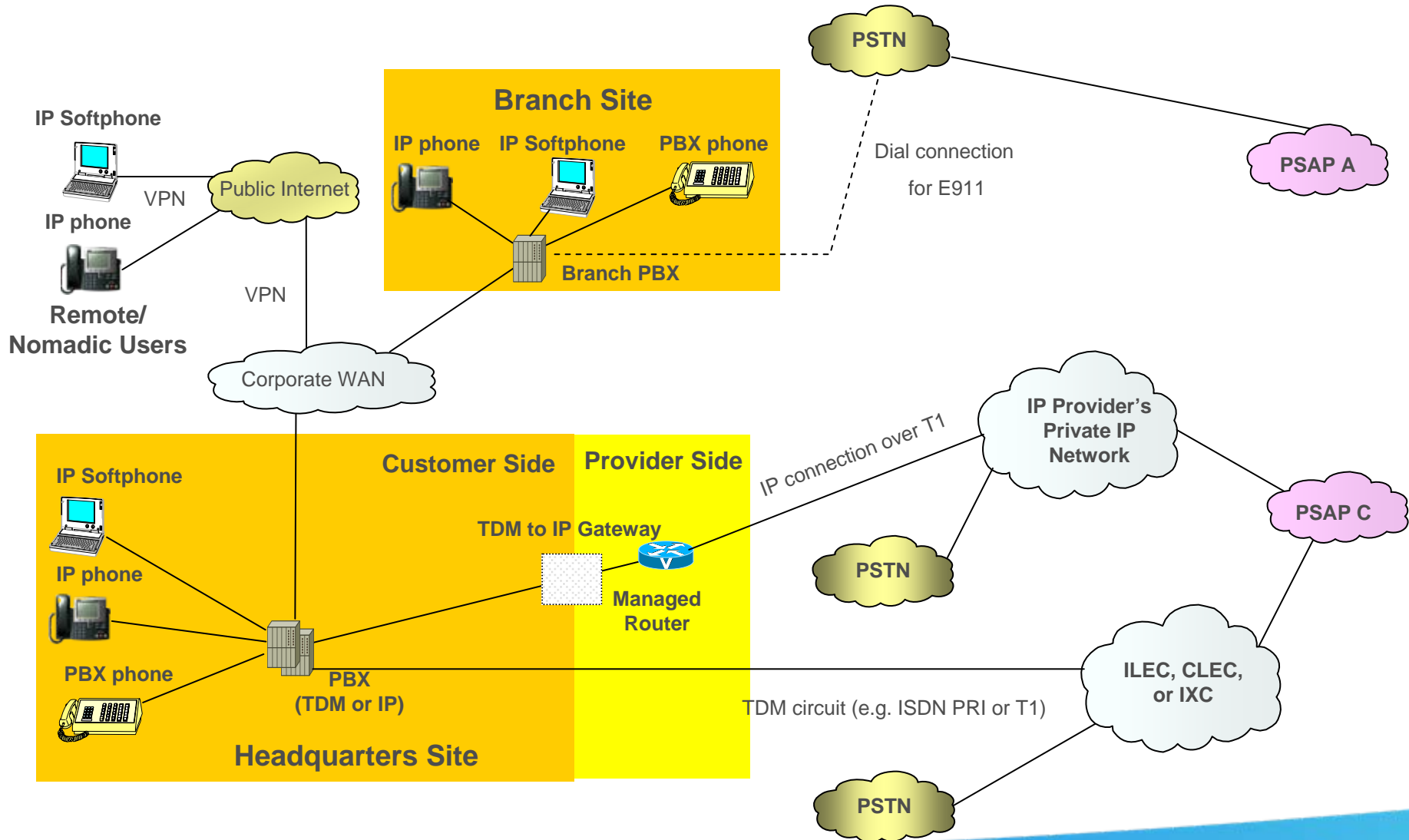
- Typically PBX owner elects that just a main billed number and corporate name and address be sent with E911 calls from PBXs

Like TDM provider, VoIP provider has no means to identify remote or nomadic users behind the PBX.

- VoIP provider has no direct electronic connection to remote or nomadic users behind the PBX , so "heartbeat" solution is not viable today.
- VoIP provider also cannot be certain alternative address updates will work.
 - PBX owner controls routing of outgoing calls (including E911), so E911 calls may not be routed back to VoIP provider.
 - Even if E911 call is sent to VoIP provider, unless PBX sends SLI, VoIP provider cannot identify source of the E911 call to know alternate routing should apply.

E911 service for PBXs served by VoIP services should be equal in quality to E911 service provided through TDM PRI services.

THE PBX CAN BE CONNECTED VIA A VoIP PROVIDER INSTEAD OF OR IN ADDITION TO ILEC/CLEC CONNECTION



IP PBX Services in the Market Today

Responding to growing customer demand to "VoIP-enable" their networks, providers are offering VoIP based network services for owners of IP PBXs, which reduce customer costs associated with moves, adds and changes and provide other enhancements possible through use of IP technology.

AT&T Voice DNA Flexible Reach service is ready for launch.

Other similar services include:

- Verizon/MCI, IP Trunking,
<http://www.verizonbusiness.com/us/voice/voip/trunking/>
- Time Warner Telecom, One Solution Connect,
<http://www.twtelecom.com/Documents/Resources/PDF/MarketingCollateral/OneSolutionConnect.5.pdf>
- Broadwing, VoIP services to PBX, (See November 28, 2005 Compliance Letter)
- XO Communications, XO One IP PBX Service, (See December 20, 2005 Waiver Petition)

***THE FCC E911 SCOPE ORDER AND VoIP E911 ORDER,
WHEN VIEWED TOGETHER,
PROVIDE GUIDANCE ON THIS ISSUE***

The FCC's 2003 "E911 Scope" order leaves the issue of whether to require E911 service for PBXs to the states, opposes policies that might harm VoIP deployment, and recognizes that multiple parties must cooperate to change E911 processes for PBXs. Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems CC Docket No. 94-102, IB Docket No. 99-67, 18 FCC Rcd 25340 (2003).

The FCC's VoIP 911 Order excludes IP PBXs: "The rules we adopt today apply to interconnected VoIP services rather than the sale or use of IP-compatible CPE, such as an IP-PBX, that itself uses other telecommunications services or VoIP services to terminate traffic to and receive traffic from the PSTN. The rules we adopt in today's Order also apply only to providers that offer a single service that provides the functionality described above. IP-Enabled Services (WC Docket No. 04-36) and E911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196), FCC 05-116, footnote 78.

RECOMMENDATIONS

Fundamentally, the Commission's June 3 VoIP 911 Order should not be viewed as overturning or modifying the E911 Scope Order.

VoIP services connected to PBXs should be expected to deliver E911 service comparable to that provided by TDM services.

The "Interconnected VoIP Service" in the case of VoIP services provided to a PBX ends at the PBX; management of the stations behind the PBX is not part of the VoIP Provider's service and is properly the responsibility of the PBX owner.

As noted in the E911 Scope Order, changes in E911 practices for PBXs require the joint cooperation and efforts of manufacturers, PBX owners, carriers, and PSAPs.

- Should the Commission wish to revisit its E911 policies for PBXs, it cannot do so by imposing obligations on VoIP services alone – instead a joint effort of state and federal regulators, PSAPs, PBX manufacturers, wireline and VoIP providers, and other interested parties would be needed.